REMARKS

Claims 1, 3 to 7, 9 to 30, 32 to 34, 42 to 44, 49, and 54 to 60 are pending in this application.[1] Claims 1, 30, and 49 are independent. Favorable reconsideration and further examination are respectfully requested.

Regarding the Information Disclosure Statement (IDS) mentioned in the Office Action (which was filed August 17, 2005), as stated in that IDS, this application is assigned to the same entity as U.S. Patent No. 6,757,714 (Hansen). U.S. Patent No. 6,757,714 was the subject of a litigation in Massachusetts, which was identified in the IDS. Both the Hansen patent and this application cover features of the same product. The art was therefore cited in order to ensure compliance with the duty of disclosure rules as set forth in MPEP §2001.06(c) ("Where the subject matter for which a patent is being sought is or has been involved in litigation, the existence of such litigation and any other material information arising therefrom must be brought to the attention of the U.S. Patent and Trademark Office."). Applicants are not aware of a particular reference among those cited that is more or less relevant than other/s that were cited. If the Examiner believes that the claims define over those references, as appears to be the case from the comments in the Office Action, he is respectfully requested to initial the Form PTO-1449 that accompanied the IDS and to return it to Applicant's representative.

Regarding the §112 rejection, without conceding its propriety, Applicants have changed all occurrences of "self-describing computer language" to XML. Withdrawal of the §112 rejection is therefore respectfully requested.

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[1] The Examiner is urged to independently confirm this recitation of the pending claims.

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Regarding the §101 rejection, Applicants note that claim 1 is claiming a method, not a computer program (claim 1 recites "the method comprising:"). To make this even more clear, Applicants have taken the word "computer program" out of claim 1. Accordingly, withdrawal of the §101 rejection is respectfully requested.

The independent claims were each rejected under §102 over U.S. Patent No. 6,560,656 (O'Sullivan), U.S. Patent No. 6,012,088 (Li), and U.S. Patent No. 6,686,838 (Rezvani). As shown above, Applicants have amended the claims to define the invention with even greater particularity. Withdrawal of the art rejections is therefore respectfully requested.

In this regard, the independent claims were amended to recite communicating with the remote computer each time the device powers-up and making a determination, each time the device powers-up, as to whether to proceed with registration based on communication with the remote computer, where the determination is made based on correctness of registration information stored on the remote computer for the device and currency of the registration information. If the determination is not to proceed with registration, the method comprises aborting registration for a current power-up of the device, and, if the determination is to proceed with registration, for the current power-up of the device the method comprises obtaining device feature information and registering the device with the remote computer using the feature information. The feature information includes a physical location of the remote computer. As requested in the Office Action, support for these amendments can be found, e.g., on page 8, lines 2 to 12 and on page 7, lines 2 to 9 of the application, although it is noted that the claims are not limited to the embodiments described in those passages.

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Rezvani, Li and O'Sullivan are not understood to disclose or to suggest the foregoing features of the independent claims. Referring to Fig. 1 of Rezvani, that patent shows using monitoring modules to register associated devices (e.g., cameras, sensors, or the like) with a remote site 14. The monitoring modules may register themselves with the remote site, in addition to the devices. Rezvani also describes the following:

> In some suitable embodiments of the present invention an installation 12 may be re-registered. For example, in the case where a system crash occurs at an installation 12, or if the hardware, software, or both is upgraded at the installation (or at the remote site), the installation may need to be re-registered. Re-registration may be necessary for any suitable reason. The process for re-registration may be substantially similar to the initial registration process for an installation, monitoring modules, resources, components, and virtual representations. (Col. 21, lines 17 to 26)

Thus, Rezvani describes a monitoring module re-registering an installation 12 (including a monitoring module) under certain circumstances ("where a system crash occurs at an installation 12, or if the hardware, software, or both is upgraded at the installation (or at the remote site)"). However, Rezvani is not understood to disclose or to suggest doing these things *each time a device is powered-up* or, in this case, each time an installation is powered-up.

Rezvani further describes the following:

> Device descriptors 49 may include, for example, a manufacturer identification, product identification, and driver version number to allow a device to be referenced correctly. Once a new device 32 has been detected and is to be integrated into the system, monitoring module 28 may reference, download, and run the appropriate drivers for the new device.
> After loading a new descriptor 49, monitoring module 28 may communicate with remote site 14 to determine whether device 32 has been previously catalogued. Monitoring module 28 may, for example, determine if a general description and a default state of device 32 exists at the remote site. When a device 32 has been catalogued, then, for example, static parameters, such as the manufacturer name, may be communicated from monitoring module 28 to remote site 14 and the default state of device 32 may exist at remote site 14. When a device 32 is not already catalogued, device 32 may communicate its default state and static parameters to monitoring module 28 that may, in turn, communicate the default state and static parameters to remote site 14. The communication from monitoring module 28 to remote site 14 may be done using name/value pairs using, for example, the normal HTTP post method discussed hereinbefore. For example, a template document may be a static parameter of device 32. (Col. 9, lines 14 to 39)

Although it is not entirely clear, Rezvani appears to describe a monitoring module detecting a

new device and checking for prior registration information. However, Rezvani does not make a

determination, *each time the device powers-up*, as to whether to proceed with registration based

on correctness of registration information stored on the remote computer for the device and the

currency of that registration information. As described in the excerpt above, if this is done at all,

it appears to be done only "where a system crash occurs at an installation 12, or if the hardware,

software, or both is upgraded at the installation (or at the remote site)".

Rezvani is also not understood to disclose or to suggest performing registration using the

physical location of the device as part of the registration information. In this regard, page 11 of

the Office Action addresses claim 18, which previously claimed that the system information

included location. However, the concept of "location" is not addressed on page 11 of the Office

Action. On page 16 of the Office Action, Iggulden (U.S. Patent No. 6,415,023) was relied upon

for its disclosure of this feature. However, as read by Applicants, Iggulden states that "additional

demographic data" can be provided to the manufacturer (col. 4, line 56 and 57). There is no

indication in Iggulden that the demographic data includes a physical location of the device.

Regarding O'Sullivan, as previously explained, that patent describes what happens when

a device joins a network. Upon joining the network, in O'Sullivan, the device conducts a

discovery process. In this discovery process, the device broadcasts, over a network, a packet that

contains a code for use in communicating with the device. A discovery server 314 receives the

broadcast and passes a reference to a lookup service 312 to the device, which enables the device

to register itself with a Djinn (see, e.g., col. 6, lines 47 et seq. of O'Sullivan). In response, the

device registers its services with the lookup service and also registers information that may be

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used to communicate with the device (see, e.g., col. 6, line 52 and col. 8, lines 8 to 12). As understood by Applicants, this occurs when a device joins a network, *not each time the device powers-up*. Moreover, since discovery server 314 knows whether a device is new to the network (see col. 6, lines 36 to 45), and therefore needs to register itself with the Djinn, O'Sullivan does not describe making a determination, *each time the device powers-up*, as to whether to proceed with registration based on correctness of registration information stored on the remote computer for the device and the currency of that registration information.

O'Sullivan is also not understood to disclose or to suggest performing registration using the physical location of the device as part of the registration information, as recognized on page 16 of the Office Action. At best, col. 7, lines 36 and 37 of O'Sullivan describe transmitting a network-accessible location in the form of a URL. Iggulden, which was cited to remedy this deficiency states that "additional demographic data" can be provided to the manufacturer (col. 4, line 56 and 57). As also noted above, there is no indication in Iggulden that the demographic data includes a physical location of the device, as set forth in the claim.

Li describes an Internet access device that is able to communicate with a remote device on the Internet, obtain a configuration file, and register with the remote device. As previously explained, Li's registration process is not automatic and requires manual intervention (see, e.g., col. 9, lines 20 et seq. and col. 11, lines 8, et seq. of Li). The cited portion of column 3 mentioned on pages 9 and 10 of the Office Action pertains to obtaining configuration information, not to registration. Furthermore, Li is not understood to disclose or to suggest registering *each time the device powers-up*, much less making a determination, *each time the device powers-up*, as to whether to proceed with registration based on correctness of registration

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information stored on the remote computer for the device and the currency of that registration information.

Regarding physical location, Applicants note that, in Li, a customer may provide a geographic location prior to device registration (col. 9, lines 44 to 48). This information becomes part of the configuration file, which is subsequently downloaded for the device upon provision of a registration ID (see, e.g., col. 9, lines 50 to 64, col. 11 lines 8 to 16, and col. 13).

For at least the reasons above, Rezvani, O'Sullivan and Li are not understood to disclose or to suggest at least the newly-added features of the independent claims. The remaining art is not understood to remedy the deficiencies of Rezvani, O'Sullivan and Li. Accordingly, independent claims 1, 30, and 49 are believed to be patentable over the art.

Each of the dependent claims is also believed to define patentable features of the invention. Each dependent claim partakes of the novelty of its corresponding independent claim and, as such, has not been discussed specifically herein.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

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In view of the foregoing amendments and remarks, Applicants respectfully submit that

the application is in condition for allowance, and such action is respectfully requested at the

Examiner's earliest convenience.

Applicants' undersigned attorney can be reached at the address shown below. All

telephone calls should be directed to the undersigned at 617-521-7896.

Please apply any fees or credits due in this case, which are not already covered by check,

to Deposit Account 06-1050 referencing Attorney Docket No. 11333-013001.

Respectfully submitted,

Date: May 4, 2006

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